

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA

Plaintiffs

v.

COMMONWEALTH OF PUERTO RICO, et
al.

Defendants

CIVIL NO.: 12-2039 (GAG)

MOTION FOR LEAVE TO FILE PRPD'S FIRST STATUS REPORT
AS PER REQUIREMENT 261

TO THE HONORABLE COURT:

COMES NOW, the Puerto Rico Police Department ("PRPD") through the undersigned counsel and respectfully states as follows:

1. The Agreement for the Sustainable Reform of the Puerto Rico Police Department (hereinafter referred to as the "Agreement") requires PRPD to file with the Court a status report that will delineate the steps taken during the review period to implement the Agreement, provide an assessment of the status of its progress, and any response to concerns raised in prior Technical Compliance Advisor's ("TCA") reports. (See, Requirement 261).

2. In compliance with the aforementioned Requirement, PRPD submitted a sealed version of the document on December 5, 2014. Prior to its public dissemination, the parties and the TCA have agreed to some redactions in the report in order to correct certain information, to avoid the identification by name of any person and to maintain the confidentiality of technological information.

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3. Consequently, PRPD respectfully requests leave from this Honorable Court to file its First Status Report, as redacted.

WHEREFORE we respectfully request from this Honorable Court that it grants the aforementioned leave to publish PRPD's First Status Report as per Requirement 261.

WE HEREBY CERTIFY that on today's date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification to the parties and counsel of record.

In San Juan, Puerto Rico, this 3rd day of February, 2015.

RESPECTFULLY SUBMITTED.

CESAR MIRANDA RODRÍGUEZ
Secretary of Justice

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